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**UNITED STATES DISTRICT COURT  
 DISTRICT OF NEVADA**

INNOVATIV MEDIA GROUP, INC., a  
 Wyoming corporation,

Plaintiffs,

vs.

MICHAEL BEYS; RICHARD DE SILVA;  
 and FTE NETWORKS, INC., a Nevada  
 corporation

Defendants.

CASE NO.: 2:22-cv-01362-CDS-VCF

**STIPULATION AND ~~[PROPOSED]~~ ORDER  
 FOR EXTENSION OF TIME FOR  
 PLAINTIFF TO OPPOSE DEFENDANTS'  
 MOTION FOR SUMMARY JUDGMENT  
 [ECF 62] AND DEFENDANTS' MOTION  
 TO STAY DISCOVERY AND STAY OF  
 DISCOVERY [ECF 63]**

**(First Request)**

**STIPULATION AND [PROPOSED] ORDER FOR EXTENSION OF TIME FOR  
 PLAINTIFF TO OPPOSE DEFENDANTS' MOTION FOR SUMMARY JUDGMENT  
 AND DEFENDANTS' MOTION TO STAY DISCOVERY AND STAY OF DISCOVERY**

Pursuant to Federal Rule of Civil Procedure 6(b) and Local Rules 6-1 and 6-2, Plaintiff Innovativ Media Group, Inc. ("Plaintiff") and Defendants Michael Beys, Richard de Silva and FTE Networks, Inc. (collectively the "Defendants") stipulate through their undersigned counsel that Plaintiff's deadline to file an opposition to Defendants' Motion for Summary Judgment filed on March 28, 2023 (ECF No. 62) be extended to April 25, 2023, and Defendants' deadline to file a reply in support of Defendants' Motion for Summary Judgment also be extended by two weeks to

May 9, 2023. Plaintiff and Defendants further stipulate through their undersigned counsel: (1) to a stay of discovery until the date an order is issued on Defendants' pending Motion to Dismiss; and, (2) that Plaintiffs' deadline to file an opposition to Defendants' Renewed Motion to Stay Discovery filed on March 28, 2023 (ECF No. 63) is extended to a date two weeks from the date the order is issued on Defendants' pending Motion to Dismiss. Defendants consent to the extension of Plaintiffs' deadlines and the stay of discovery.

DATED this 10<sup>th</sup> day of April, 2023.

FENNEMORE CRAIG, P.C.

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-AND-

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DATED this 24th day of April, 2023.

LEX DOMUS LAW

By: /s/ Brandi M. Planet  
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*Attorneys for Defendants*

**IT IS SO ORDERED.**



UNITED STATES MAGISTRATE JUDGE